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September 5, 1996

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W. Room 222
Washington, D.C. 20554

RE: In the Matter of Implementation of the Local Competition Provisions in the
Telecommunications Act of 1996, CC Docket No. 96-98

Dear Mr. Caton:

Yesterday, representatives of Sprint Corporation met with Richard Metzger, Deputy Chief, Common Carrier Bureau, and Common Carrier Bureau staff members Melissa Newman, Paul Gallant and Raj Kannan to discuss issues and questions arising from the 1st and 2nd Reports and Orders in the above referenced proceeding. Attached is an outline of the issues raised.

Representing Sprint Corporation were: John Hoffman, Jay Keithley, Alan Sykes, Leon Kestenbaum, and Dick Juhnke. We request that this information be made a part of the record in this matter. Two copies of this letter, in accordance with Section 1.1206(a)(1), are provided for this purpose. If you have any questions, please feel free to call.

Sincerely,

Jay C. Keithley

Attachments

cc: (w/o attachments)
Richard Metzger
Melissa Newman
Paul Gallant
Raj Kannan

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Issues/Questions
arising from
CC Docket No. 96-98

1st and 2nd Reports and Orders

September 4, 1996

**1st Report and Order
CC Docket No. 96-98**

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Operations Support Systems

¶525 "...an incumbent LEC must provide, upon request ... as expeditiously as possible, but in any event no later than January 1, 1997."

ISSUE: While Sprint supports the FCC findings on the importance of access to operations support systems, the "no later than January 1, 1997" is problematic. There are no industry standards and CLEC negotiations to date have not provided other than general requirements; the specificity does not exist to make systems changes. Uniform standards would be helpful to both CLECs and ILECs.

Proxy Rates - Unbundled Loops

¶797 "We ... require that in all cases the weighted average of unbundled loop prices ... should be less than the proxy ceiling ..."

ISSUE: Do proxy rates have to be deaveraged? If so, how? Deaveraging of proxy rates poses peculiar problems. The results will be inherently arbitrary, since the proxy rate itself does not reflect even the average cost of any one ILEC. Efforts to deaverage proxy rates will detract from efforts to establish cost based rates.

Symmetry - Use of BOC Rates

¶1085 "If both parties are incumbent LECs...we conclude that the larger LEC's forward-looking costs should be used to establish the symmetrical rate for transport and termination."

ISSUE: Since the BOC will always be larger, the symmetrical rate between a BOC and another ILEC will be the BOC rate regardless of the other ILEC's costs. Could a CLEC interconnecting with the non-BOC ILEC then choose this BOC rate under most favored nation provisions?

ISSUE: Since no timeframe is set for renegotiation of ILEC to ILEC arrangements with Class B companies, are these arrangements available on a most favored nation basis to CLECs?

Symmetry - Transport and Termination

¶1090 "... states shall also consider whether new technologies (e.g., fiber ring or wireless networks) perform functions similar to those performed by an incumbent LEC's tandem switch and thus, whether some or all calls terminating on the new entrant's network should be priced the same as the sum of transport and termination via the incumbent LEC's tandem switch."

ISSUE: See Diagram. The application of rates to CLEC networks is not clear and could result in "asymmetrical" rate applications. This is especially true if CLECs are allowed to charge for transport beyond their end offices.

Resale - Service to Payphone Providers

¶876 "... we conclude that incumbent LECs need not make available service to independent public payphone providers at wholesale rates."

ISSUE: Already payphone providers are seeking certification from states to be "telecommunications carriers" with the intent to obtain wholesale discounts on payphone lines. However, ¶875 states that ILECs are not required to give wholesale discounts to parties purchasing the service for their own use. Does ¶875 then preclude a payphone provider that is also a telecommunications carrier from buying at the wholesale rate? Should payphone lines be treated like access and therefore not be available at wholesale rates?

2nd Report and Order

CC Docket No. 96-98

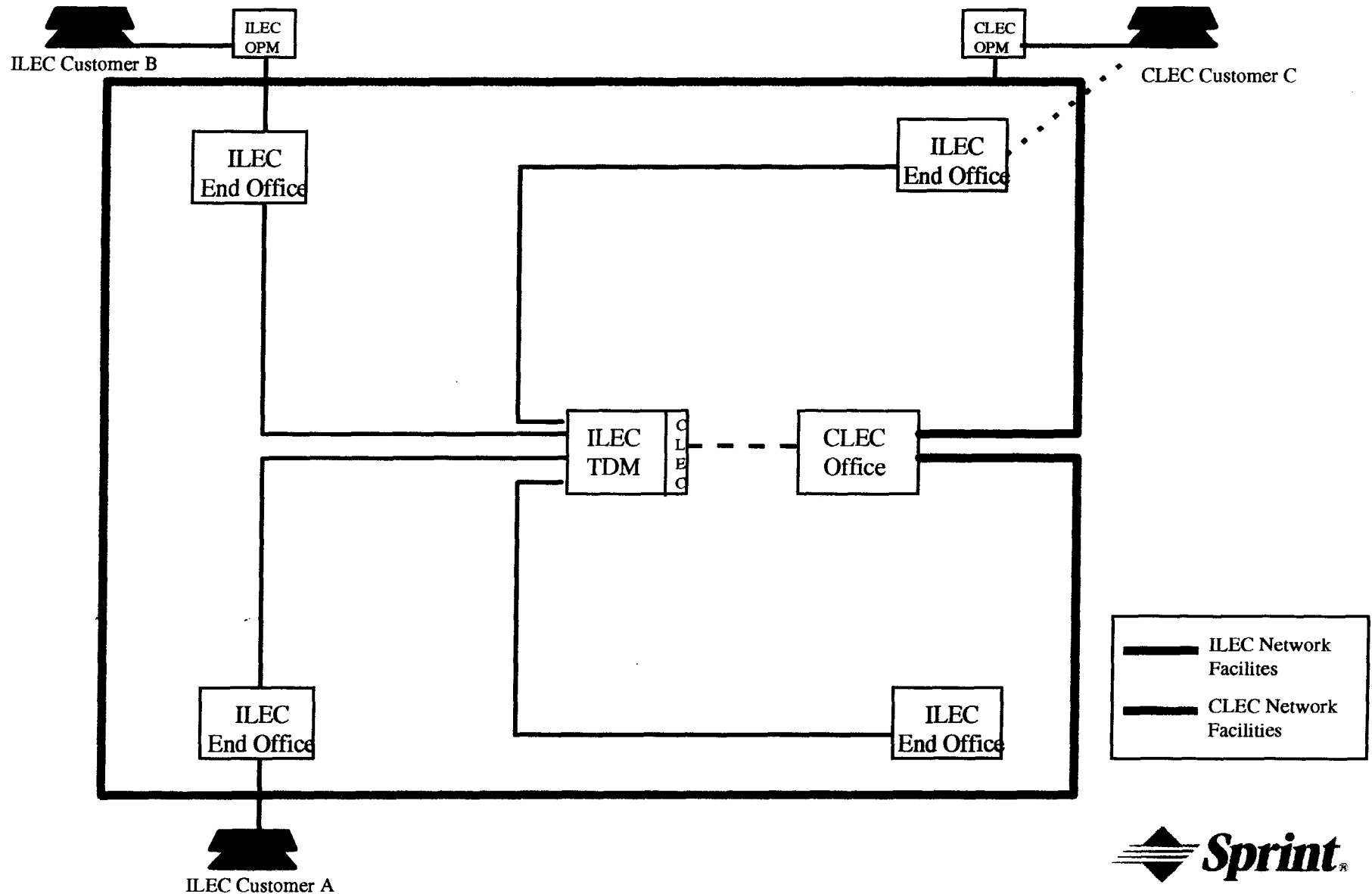
Dialing Parity - Non-SPC Offices

¶54 "... we decline to adopt at this time a requirement prescribing the location for deployment of presubscription software."

ISSUE: Does centralized (tandem) equal access satisfy the dialing parity obligation? Are ILECs required to replace non-SPC offices to provide intraLATA equal access? Centralized equal access at the tandem will provide "1+" intraLATA access but can not provide "10XXX" dialing capability.

ILEC vs CLEC TRANSPORT

(TRANSPORT TERMINATION UNDER SECTION 251(b)(5), RECIPROCAL COMPENSATION)



**Electronic Interface Requirements
for Resale and Facility Based Local Competition**

<u>Functional Requirements</u>	<u>Required</u>	<u>Existing</u>
Pre-Service Ordering	Real time electronic interface at parity	No systems or Industry Standards
Service Ordering	Real time electronic interface at parity	Electronic interfaces available but there is no Industry consensus
Unbundled Services Ordering	Real time electronic interface at parity	ASR Standards exist for IXC market but new unbundled services are currently being addressed by OBF
Provisioning	Real time electronic interface at parity	No systems or Industry Standards
Repair/Maintenance	Real time electronic interface at parity	Partial Industry Standards Exist for IXCs. No Industry Standards for Mechanized Line Testing (MLT).
Listings	Real time electronic interface at parity	No systems or Industry Standards
Message Exchange	Real time electronic interface at parity	EMI/EMR via NDM
Billing Media	Electronic Media	Multiple Industry interfaces dependent upon whether Incumbents bills via CABS, CRIS, or new systems or in some RBOCs combinations of the above.

Pre-Service Ordering:

ILEC must provide electronic access to:

1. Priority - Installation Appointments (Resale and Facility)
2. Priority - Telephone Number Assignment (Resale and Facility)
 - Electronic interface to the number reservation systems
 - Inquiry and reservation of vanity numbers.
 - Reassign (coincident with an end user request) any number within the local service geographic boundaries of the ILEC.
3. Priority - Facility Availability (Resale and Facility)
4. Priority - Customer Service Records for "As Is" Verification (Resale and Facility)
5. Priority - Street Address Guide, Address to Central Office ID (Resale and Facility)
6. Priority - Feature Availability by USOC by Central Office (Resale and Facility)
7. Verification of Customer credit worthiness where collaborative databases don't exist. (Resale and Facility)

Service Ordering:

ILEC must provide electronic access to:

1. Status Notification (Resale and Facility)
 - **Priority** - Firm Order Confirmation (FOC)
 - **Priority** - Service errors and jeopardy's
 - Charges associated with required construction
2. **Priority** - Ability to update ILEC's 911/E911 database information directly (Facility)
3. **Priority** - Ability to update ILEC's LIDB database information directly (Facility)
4. Ability to suspend/restore service on request via electronic interface (Resale and Facility)

Unbundled Services Ordering:

ILEC must provide electronic access to:

1. **Priority** - Ordering of unbundled Local Loop
2. **Priority** - Ordering of unbundled Network Interface Device
3. **Priority** - Ordering of unbundled Switching Capacity
 - Local Switching
 - Tandem Switching
4. Ordering of unbundled Interoffice Transmission Facilities
5. Ordering of unbundled Signaling Networks and Call-Related Databases
6. Ordering of unbundled Operations Support Systems Functions
7. Ordering of Operator Services and Directory Assistance

Provisioning:

ILEC must provide electronic access to:

Priority - Status Notification (Resale and Facility)

- Service order completion
- Service errors, jeopardy's, missed appointments and no access

Repair/Maintenance - Service Assurance (Prevention/Detection/Restoration): (Priority)

ILEC must provide electronic access to:

1. **Priority - Ability to schedule appointments upon creation of the trouble report. (Resale and Facility)**
2. **Priority - Interface to perform the following functions (Resale and Facility)**
 - Trouble ticket entry and update capabilities
 - Preview and verify test results including cause and disposition codes
 - Provide status updates on open trouble tickets
 - Verify feature and function update and corrections
 - Provide dispatch status as well as location and ETA
 - Provide on line mechanized line testing (MLT) capability
3. **Major Outage Notification**
 - Notification of any significant network outage reportable to the FCC
 - Immediate notification of any host or remote out of service
 - Provide a means to notify Sprint of ILEC switch and trunk failures.

White and Yellow Page Listings:

ILEC must provide the methods and procedures to electronically order classified listings, professional listings acceptable abbreviations, etc. via Industry Standard electronic interface for white and yellow pages listings. (Resale and Facility)

Message Exchange:

ILEC must provide electronic access to:

Priority - Electronic interface for daily exchange of messages via NDM in Industry Standard EMR format. (Resale and Facility).